

2. Ganart's breach of contract claim fails as a matter of law because: (1) TurnKey did not breach the parties' non-disclosure agreement; and (2) Ganart has not sustained any damages from any alleged breach of contract.
3. Ganart's claims for aiding and abetting and civil conspiracy fail as a matter of law because there is no evidence that TurnKey conspired with or aided and abetted any third party to misappropriate any of Ganart's proprietary information.

Therefore, TurnKey requests entry of summary judgment in its favor.

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By: /s/ David W. Williams

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CERTIFICATE OF SERVICE

On January 19, 2015, I electronically submitted the foregoing document with the clerk of the court of the U.S. District Court, Northern District of Texas, using the CM/ECF system, which will send a notice of electronic filing to all counsel of record. I hereby certify that I have served all counsel of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ David W. Williams

David W. Williams